

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE NIELSEN HOLDINGS PLC
SECURITIES LITIGATION

Civil Action No. 1:18-cv-07143-JMF

**NOTICE OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION, APPOINTMENT
AS CLASS REPRESENTATIVES, AND APPOINTMENT OF CLASS COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Public Employees' Retirement System of Mississippi ("MissPERS") and additionally named Plaintiff Monroe County Employees' Retirement System ("Monroe") (collectively, "Plaintiffs") hereby move this Court pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3), and 23(g), for an order: (i) certifying this case as a class action; (ii) appointing Plaintiffs as Class Representatives; and (iii) appointing Labaton Sucharow LLP as Class Counsel.

In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law and Declaration of Christine M. Fox attaching Exhibit A, the Expert Report of Chad Coffman, CFA, dated July 14, 2021, Exhibit B, the firm résumé of Lead Counsel Labaton Sucharow LLP, Exhibit C, the firm résumé of Additional Counsel Robbins Geller Rudman & Dowd LLP, and Exhibit D, Defendants' Responses and Objections to Plaintiffs' First Set of Requests for Admission Directed to All Defendants, served on Plaintiffs on July 12, 2021.

Pursuant to the Joint Civil Case Management Plan and Scheduling Order entered by the Court on February 5, 2021 (ECF No. 95), the Parties will meet and confer and submit a proposed discovery and briefing schedule within seven days of filing the motion for class certification.

The Parties anticipate agreement on a briefing schedule resulting in the submission of Defendants' opposition in October 2021 and Plaintiffs' reply in December 2021.

Dated: July 14, 2021

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